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September 10, 2019

Via ECF

Hon. Denis R. Hurley, U.S.D.J.
United States District Court
for the Eastern District of New York
100 Federal Plaza
Central Islip, NY 11722

***Re: Capricorn Management Systems, Inc. v. Government Employees
Insurance Co., 15-cv-02926-DRH-SIL***

Dear Judge Hurley:

We represent Plaintiff Capricorn Management Systems, Inc. ("Capricorn") and write, in accordance with Rules 3(E) and 4(C) of Your Individual Practice Rules, to request an enlargement of the page limit for Capricorn's objections to the Order, Reports and Recommendation of Magistrate Judge Steven I. Locke (the "R&R"), which was filed on July 22, 2019. For the reasons herein, Capricorn respectfully requests that the page limit for its objections to the R&R be enlarged from twenty-five (25) pages to fifty (50) pages.

The R&R is 67 pages long and relates to four substantive motions – two motions for summary judgment, a motion to strike expert disclosures and preclude testimony pursuant to Fed. R. Civ. P. 26(a)(2), and a motion for sanctions pursuant to Fed. R. Civ. P. 37(e)(2). In addition, the R&R addresses four motions to seal documents. Each of these motions contains voluminous filings by the parties, addressing complex issues over multiple claims. The additional pages are necessary for Capricorn to completely and sufficiently address all objections to the R&R as it relates to these eight motions. If the page limit is not enlarged, it would be nearly impossible for Capricorn to address all issues contained in the R&R and appropriately raise its permitted objections. As set forth in Your Individual Practice Rule 3(E), requests to exceed page limits should be freely granted when a motion addresses numerous claims so that the party may fully brief all issues, as is the situation here.

Accordingly, Capricorn hereby requests that the page limit for its objections to the R&R be enlarged to fifty (50) pages. The current deadline for Capricorn to file its objections to the R&R is September 13, 2019. There have been no previous requests to enlarge the page limit for objections to the R&R.

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Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Richard C. Schoenstein', with a long horizontal flourish extending to the right.

Richard C. Schoenstein

cc: Counsel of Record (via CM/ECF)